

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 07 CR 50058-5
)	Judge Philip G. Reinhard
MARK O. COOPER)	

UNITED STATES' NOTIFICATION OF EXPERT TESTIMONY

The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), hereby submits the following notification regarding expert testimony the United States intends to offer in its case-in-chief:

I. Detectives Scott Olson and James Bowman, Rockford Police Department

A. Witness Qualifications

Detailed resumes listing Detective Olson's and Detective Bowman's educational background, training, and work experience will be provided to defense counsel. Both Detective Olson and Detective Bowman are assigned to the Rockford Police Department's Identification Unit, and are responsible for processing crime scenes for physical evidence, including latent print evidence. Both have completed training in the development and comparison of latent print evidence, including a 40 hour course in fingerprint identification put on by the Federal Bureau of Investigation and a 40 hour course in basic crime scene technology at Northwestern University. Both have been involved in processing hundreds of crime scenes, to include the development and comparison of latent print evidence on numerous occasions. Both Detective Olson and Detective Bowman have testified in courts of law regarding the development and comparison of latent print evidence.

B. Summary of Testimony

The United States expects Detective Olson to testify that on August 2, 2007, he responded to the scene of an armed robbery at the Soto's Jewelry Store located at 1126 South Main Street in Rockford, Illinois. Detective Olson and another Identification Unit detective, James Bowman, processed the scene of the robbery for evidence. After taking photographs of the scene, Detective Olson processed the areas of the store known to have been touched by the robbery suspects. Detective Olson was able to develop three palm impressions from the counter tops in the store, including one from the southernmost of two adjacent counters along the east wall of the business. Detective Olson took lifts of these latent impressions and later determined that they were of comparable value. Detective Olson requested known palm impressions from the defendant in order to compare those known impressions to the latent palm impressions developed on August 2, 2007 at the Soto's Jewelry store.

On June 7, 2008, Detective Olson compared the latent palm impressions recovered from the counter tops at the Soto's Jewelry store on August 2, 2007 to known inked palm impressions of the defendant Mark O. Cooper, which had been taken from Cooper by Special Agent Steve Smith of the Bureau of Alcohol, Tobacco, Firearms, and Explosives pursuant to court order on June 4, 2008. Detective Olson concluded that the known left palm impression of the defendant Mark O. Cooper matched the latent palm impression recovered from the southernmost of two adjacent counters along the east wall of the Soto's Jewelry store on August 2, 2007. Detective Olson's conclusion was then confirmed by Detective James Bowman. No match was made to the other two latent palm impressions recovered from the Soto's Jewelry store on August 2, 2007.

Detective Olson's and Bowman's opinions are based upon their examination of the latent impressions taken from Soto's Jewelry Store on August 2, 2007 and the inked card containing the defendant Mark O. Cooper's palm impressions, as well as their certification as latent print examiners and their experience in developing and comparing hundreds of latent impressions during their careers.

Respectfully submitted,

PATRICK J. FITZGERALD
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BY: _____/s
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CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document:

United States' Notification of Expert Testimony

was served pursuant to the district court's ECF system as to ECF filers on June 9, 2008.

/s

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